

IN THE DISTRICT COURT OF THE UNITED STATES  
FOR THE DISTRICT OF SOUTH CAROLINA  
SPARTANBURG DIVISION

UNITED STATES OF AMERICA	)	
	)	CRIMINAL NUMBER: 8:20-cr-00467-DCC
vs.	)	
	)	
ROGER NAVARETTE,	)	MOTION FOR BOND
_____	)	

The Defendant was charged with a 2 count indictment involving the investigation of counterfeit Federal Reserve notes. Defendant entered a plea of guilty to count 1, the conspiracy charge on, July 19, 2021

The Defendant, through counsel Janis Richardson Hall, moves for the Court to reconsider bond allowing him to return home in California for the following reasons:

1. It is imperative to obtain information regarding his prior record which the Defendant possibly will be able to obtain. This will assist his attorney in preparing for the Presentence Report. Defendant will be able to go in person which will likely allow him to obtain the vital documentation. Both counsel and the United States Probation Office have made several unsuccessfully attempts to obtain records.
2. The Defendant has entered a plea of guilty and has signed a plea agreement.
3. The Defendant needs time to get his affairs in order as plea agreement contains a cap of eleven (11) years and an active sentence is probable.
4. The one Co-Defendant from California was recently allowed to return to California. All other Co-Defendants have been released on bond.
5. Counsel anticipates significant delays in obtaining records from California if Defendant is not allowed to return home to assist.

Counsel for the Defendant humbly believes that conditions of bond can assure compliance of Defendant future appearance at court. Counsel respectfully requests a small surety bond which will allow Defendant to return home pending sentencing.

Respectfully submitted,  
s/ Janis Richardson Hall  
Janis Richardson Hall  
Federal Id# 5603  
606 Pettigru Street  
Greenville, SC 29603  
(864) 370-0882  
(FAX) 370-9535

Dated: August 11, 2021